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Long Distance Services

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December 11, 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Anna Gomez
Chief, Network Services Division
Common Carrier Bureau
Federal Communications Commission
Washington, D.C. 20554

Received

DEC 15 1998

Common Carrier Bureau
Network Service Division
Office of the Chief

Dear Ms. Gomez:

Subject: Requirement for RespOrgs to Submit Explanations Regarding Compliance with 888 Number Right of First Refusal Process

1. AT&T Canada Long Distance Services Company (AT&T Canada LDS) is in receipt of a letter from the FCC dated November 24, 1998 addressed to Michael Wade of Database Service Management, Inc. (DSMI). In its letter to DSMI, the FCC required DSMI to forward a copy of the letter to RespOrgs who reported less than 100% subscriber results for the process established for subscribers to exercise their right of first refusal to request 888 numbers that had been set aside for them.
2. AT&T Canada LDS submits that its Government Affairs Group is charged with investigating and responding to any issues that pertain specifically to government matters. Unfortunately, due to unforeseen circumstances, the Government Affairs Group only received the aforementioned letter on December 10, 1998. Since receipt of the letter, we have been in contact with several other internal departments including Inbound Provisioning, Toll-Free Marketing, Marketing Communications and Sales in an attempt to understand why it appears that AT&T Canada LDS has failed to comply with the aforementioned process.
3. AT&T Canada LDS has launched a widespread internal investigation on this matter that will take approximately one month to complete. In the last 24 hours, we have already learned that all replicated numbers under the UXC01 RespOrg received from the SMS/800 on July 1, 1998 and thereafter have been correlated with active customer names and AT&T Canada LDS Sales Representatives. All AT&T Canada LDS Sales Representatives were advised on July 15, 1998 of the replicated numbers and the process that was to be followed to either reserve a specific number or send it to spare. AT&T Canada LDS will continue to investigate this matter between now and the end of January.

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4. To the extent that AT&T Canada LDS is in non-compliance with its requirements, it will in fact take appropriate measures to ensure compliance in the near future. AT&T Canada LDS will provide the FCC the results of its internal investigation and an action plan to ensure compliance with the applicable requirements by February 01, 1999.

Yours truly,

A handwritten signature in black ink, appearing to read 'Arthur Gottlieb', with a large, sweeping loop at the end.

Arthur Gottlieb

**Arthur Gottlieb**

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Received**FEB 11 1999**

Common Carrier Bureau
Network Service Division
Office of the Chief

February 2, 1999

Ms. Anna Gomez
Chief, Network Services Division
Common Carrier Bureau
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Gomez:

Subject: Requirement for RespOrgs to Submit Explanations Regarding
Compliance with 888 Number Right of First Refusal Process

This is further to our letter dated December 11, 1998 with respect to the above noted subject. In the letter, AT&T Canada Long Distance Services Company (AT&T Canada LDS) advised the FCC that it would provide further information with respect to its action plans by February 1, 1999. This letter provides the status of AT&T Canada LDS' efforts in this area. We apologize for the delay in sending this information.

Since the issuance of the above referenced letter, AT&T Canada LDS has conducted an in-depth review of the status of the 888 numbers which have been set aside for the purpose of allowing subscribers to exercise their right of first refusal. This investigation, which was based on the most up to date list of affected 800 numbers, has taken somewhat longer than expected due to the fact that the list was significantly different from the one used for our first investigation undertaken last summer.

To date, AT&T Canada LDS has identified customers for over 85% of the 1,290 numbers that appear on the DSMI list. These numbers will all undergo the process described below. The remaining 15% are under further investigation; any without an associated customer and which have not been churned to other carriers, will be returned forthwith to the SMS 800 pool of numbers.

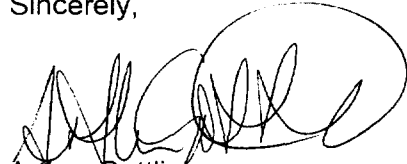
Process

During the week of February 1, 1999, AT&T Canada LDS will send letters to the approximately 700 affected customers, requesting that they indicate in writing by mid February whether they wish to place their 800 number(s) into service or turn it/them back. Follow-up correspondence will be sent in early March, and periodically thereafter, to those from whom a response is still outstanding. Needless to say, any numbers made spare will be turned back to the 800 SMS pool as quickly as possible.

Due to the inherent advantages that this process has over the one employed last summer, AT&T Canada LDS expects a much better response this time. Previously, the sales agent identified with the number was tasked with communicating with the customer regarding the status of the 800 number in question. AT&T Canada LDS believed at the time that the person most directly involved with the end customer would have the greatest opportunity for success. However, the results show that this is not the case.

The process currently underway ensures that each customer will be advised on a timely basis and is provided with sufficient opportunity to respond. Although this process cannot guarantee a 100% response rate immediately, it will certainly move the yard stick much closer to that goal.

Sincerely,



Arthur Gottlieb